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June 5, 2013

By ECF

The Honorable Judith H. Wizmur
United States Bankruptcy Judge
United States Bankruptcy Court of the District of New Jersey
401 Market Street
Camden, NJ 08101

Re: *In re: Woodcrest Country Club, Debtor*
Chapter 11
Case Number 12-22055-JHW

Dear Judge Wizmur:

On March 28, 2013, Your Honor held a hearing on our firm's application for fees and expenses in handling the appeal of the foreclosure of the Debtor's property by Sun National Bank. Sun National Bank voiced opposition to the application at the hearing on the grounds that the Debtor's estate had not been benefited by our firm's work. At the time of the hearing the Appellate Division of the NJ Superior Court had not yet rendered its decision on the appeal. At the hearing Your Honor agreed defer a determination until the Appellate Division had ruled, based on our firm's argument that if the Appellate Division agreed with the position our firm was espousing on the Debtor's behalf, there would be a benefit to the Estate. To date, the Appellate Division has not announced its decision in the case.

The Debtor's Trustee has now entered into a settlement agreement with Sun National Bank. One major element of that settlement is that the appeal is to be dismissed. In fact, the Trustee's counsel has asked this firm to file a substitution of appearance in the appellate proceeding to enable the Trustee to dismiss the appeal. As a result of the Trustee's agreement with the bank, the Appellate Division matter will be dismissed without determination. The Trustee's counsel has made clear in writing that the signing of that substitution by this firm will not serve as a waiver of any of this firm's rights to seek compensation and preserves the rights of all parties, including the Trustee, to oppose the application for compensation.

Fellheimer & Eichen LLP therefore respectfully requests that:

1. Your Honor schedule a hearing to consider Fellheimer & Eichen LLP's fee application in light of the occurrences discussed above. We respectfully request that Your Honor schedule the hearing for either June 27, 2013 or July 11, 2013

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Page Number 2

when, we are told by Your Honor's Chambers, Your Honor will be hearing fee applications; and

2. Enter an Order allowing Fellheimer & Eichen LLP to supplement its brief with its rationale for why Your Honor should grant the Fellheimer & Eichen LLP Fee Application in light of the recent occurrences, and allowing other parties to file their opposition thereto prior to the hearing date.

Respectfully,

Alan S. Fellheimer

ASF:mys

cc: All Counsel and Parties via ECF